

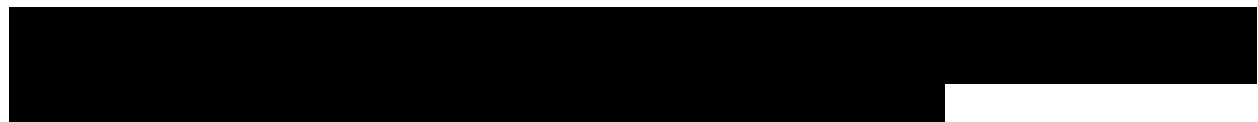
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CBI Substantiation

What harmful effects to your competitive position, if any, do you think would result if [EPA](#) publishes on the [Inventory](#) the identity of the chemical substance? How could a competitor use such information given the fact that the identity of the substance otherwise would appear on the [Inventory](#) of chemical substances with no link between the substance and your company or industry? How substantial would the harmful effects of disclosure be? What is the casual relationship between the disclosure and the harmful effects?



For what period of time should confidential [treatment](#) be given? Until a specific date, the occurrence of a specific event, or permanently? Why?



Has the [chemical substance](#) been patented? If so, have you granted licenses to others with respect to the patent as it applies to the chemical substance? If the [chemical substance](#) has been patented and therefore disclosed through

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the patent, why should it be treated as confidential for purposes of the Inventory?

■

Has the identity of the [chemical substance](#) been kept confidential to the extent that your competitors do not know it is being [manufactured](#) on imported for a commercial purpose by anyone?

■

Is the fact that someone is manufacturing or importing this [chemical substance](#) for commercial purposes available to the public, e.g., in technical journals or other publications; in libraries; or in [State](#), local, or [Federal agency](#) public files?

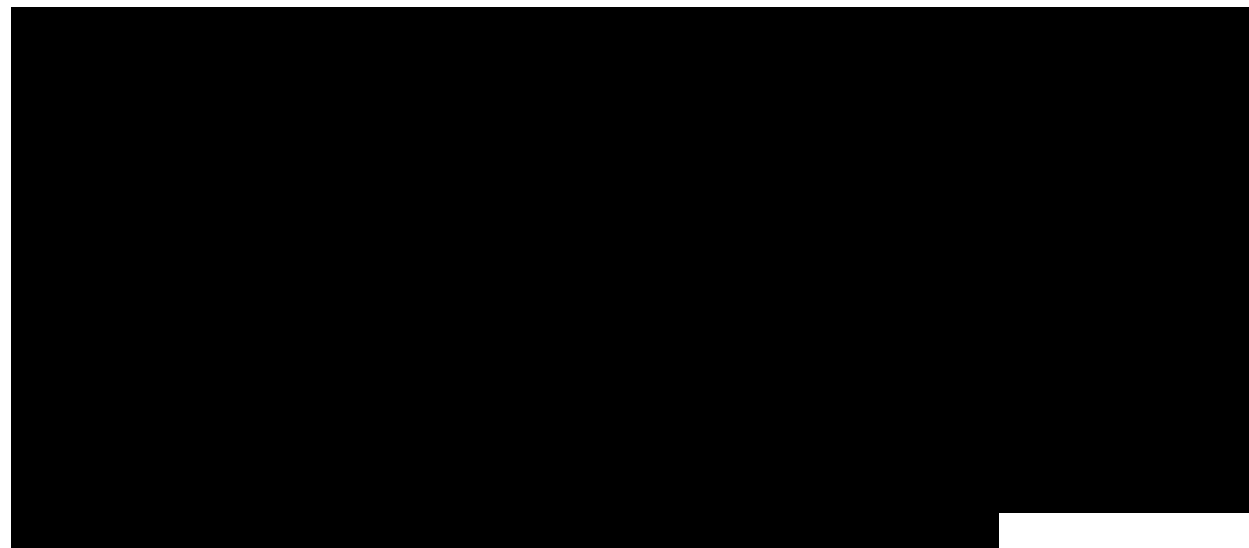
■

What measures have you taken to prevent undesired disclosure of the fact that you are manufacturing or importing this substance for a commercial purpose?

■

To what extent has the fact that you are manufacturing or importing this [chemical substance](#) for a commercial purpose been disclosed to others? What precautions have you taken in regard to these disclosures? Has this information been disclosed to the public or to competitors?

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In what form does this particular [chemical substance](#) leave the site of [manufacture](#), e.g., as part of a [product](#); in an effluent or emission stream? If so, what measures have you taken to guard against discovery of its identity?



If the [chemical substance](#) leaves the site of [manufacture](#) in a [product](#) that is available to either the public or your competitors, can they identify the substance by analyzing the product?



For what purpose do you [manufacture](#) or import the substance?

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[REDACTED]

Has [EPA](#), another [Federal agency](#), or any Federal court made any pertinent confidentiality determinations regarding this chemical substance? If so, copies of such determinations must be included in the substantiation.

[REDACTED]